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Collaborative Solutions, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

CARE AMBULANCE SERVICE, INC.,  
FALCK USA, INC., FALCK NORTHERN  
CALIFORNIA CORP., and FALCK  
ROCKY MOUNTAIN, INC.,

Plaintiffs,

v.

SCOTT GRIFFITH COLLABORATIVE  
SOLUTIONS, LLC d/b/a SG Collaborative  
Solutions, LLC.,

Defendant.

Case No: 4:19-cv-08171-SBA

Related to: 4:19-cv-06104-SBA

**DECLARATION OF MICHAEL J.  
COFFIN IN SUPPORT OF SG  
COLLABORATIVE SOLUTIONS'  
REVISED SPECIAL MOTION TO  
STRIKE (ANTI-SLAPP MOTION)**

1 I, Michael J. Coffin, hereby declare as follows:

2 1. I am the COO of Defendant Scott Griffith Collaborative Solutions, LLC d/b/a SG  
3 Collaborative Solutions, LLC (“SGCS”). I am personally knowledgeable regarding the subject  
4 matter stated herein and make this declaration in support of SGCS’s *Revised* Special Motion to  
5 Strike (Anti-SLAPP Motion).

6 2. I am one of three members of SGCS. I was a member/owner of SGCS prior to  
7 and on September 26, 2019, when Plaintiffs filed this lawsuit.

8 3. I am currently a California resident, and have been a California resident at all  
9 times relevant to this dispute. I live in Paso Robles, California, at a residential address, a fixed  
10 residence, that I have lived at since 2003, and I have the intention to remain at that California  
11 residence indefinitely. I hold a California driver’s license, am registered to vote in California,  
12 and voted in the most recent statewide general election in November 2018.

13 4. SGCS discovered FNC’s infringement in the Alameda County RFP on September  
14 4, 2019.

15 5. I drafted our cease-and-desist letter to FNC, a copy of which is attached to the  
16 Amended Complaint as Exhibit C, while sitting in California. On behalf of SGCS, I emailed that  
17 cease-and-desist letter from my work email address, michael@sgcdigital.com, from California,  
18 where I live, on September 10, 2019. See the first page of the letter, which states it was  
19 “Transmitted via email to: bill.sugiyama@falck.com,” which is a true and correct recitation of  
20 the transmission method I used on September 10, 2019. The physical address on the letter is the  
21 physical address we have registered with the Texas Secretary of State for SGCS and that we use  
22 in all business-related documents, but it is not the physical address from which the letter was  
23 transmitted. The letter was transmitted from my physical address in California.

24 6. On the afternoon of September 10, 2019, Troy Hagen, acting as CEO of FNC,  
25 telephoned me in California responsive to the letter. My understanding is that Troy Hagen also  
26 lives and works in California. During that telephone call and in a subsequent text exchange, Mr.  
27 Hagen admitted that in addition to the Alameda County RFP, SGCS’s content was used in RFPs  
28 for Los Angeles and Orange Counties.

1           7.     The *Colorado Springs Independent* sought comment from SGCS concerning the  
2 copy of our cease-and-desist letter that they had republished in an online article. See the article  
3 attached as Exhibit D to the Amended Complaint. On behalf of SGCS, I made the media response  
4 reproduced in that article from California, where I live.

5  
6           I declare under penalty of perjury under the laws of the United States of America that the  
7 foregoing is true and correct.

8  
9     Dated: May 6, 2020

  
Michael J. Coffin